

Before the
Federal Communications Commission
Washington, DC

In the Matter of)	MM Docket No. 99-78
)	
Amendment of Section 202(b),)	
Table of Allotments,)	RM-9478
FM Broadcast Stations)	RM-9646
(Blackduck and Kelliher, MN))	

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch

REPLY COMMENTS

De La Hunt Broadcasting ("DeLaHunt"), by its attorney, hereby submits the following Reply Comments with regard to its counterproposal filed in response to the Notice of Proposed Rule Making, DA 99-535 (Chief, Allocations Branch, March 19, 1999), adopted in this proceeding.

The NPRM in this proceeding requested comment on the proposal filed by Christian Religious Broadcasters ("CRB") in this proceeding to amend the FM Table of Allotments to add Channels 221A and 283A to Blackduck, Minnesota. As a Counterproposal, DeLaHunt requested that the Commission retain the proposed amendment for Channel 283A to Blackduck, but allot Channel 221A instead to Kelliher, Minnesota. As conceded by CRB in its Petition, Blackduck already is served by an existing FM frequency, Channel 252C2. The grant of CRB's proposal would result in three frequencies being assigned or allotted to the same community. This is despite the fact according to the most recent U.S. Census Data available for the area, the entire population of Blackduck consists only of 787 persons. In contrast, under DeLaHunt's proposal, one of the channels proposed for use at Blackduck would be instead assigned to Kelliher, Minnesota.

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